Oregon
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RE: Antelope Grazing Allotment Environmental Assessment (EA)

Oregon Department of Fish and Wildlife (the Department) supports alternative 3 with the following recommendations to monitor impacts to significant plant, fish and wildlife habitats. The project area contains 620 acres of fen habitats. Fens support unique and rare plant species. Eight sensitive vascular plants and five sensitive bryophytes species were documented in the project area. There are seven miles of perennial stream (Jack Creek) and 287 miles of intermittent streams within the project area. Miller Lake lamprey a sensitive species and Oregon spotted frog a Federal proposed species are found throughout the perennial portion of Jack Creek. The project area contains 10,125 acres of winter range habitat within the Fort Rock Wildlife Management Unit.

The Department supports grazing the Chemult and North Sheep pastures using deferred rotation and graze Jack Creek and the meadow units within the Chemult pasture using a deferred rotation riparian grazing system. This will allow better distribution of cattle across the landscape and increase flexibility in grazing management. The Chemult and North Sheep pastures contain approximately 3,985 and 1,095 acres respectively of riparian, moist to wet meadows, willow wetlands, fens, aspen stands and lodgepole wetlands in various seral stages. These habitats support a wide diversity of plants, fish and wildlife.

The eastern pastures (Halfway, North Willow and Tobin) receive less precipitation than the western pastures and many of the riparian areas and stock ponds are dry by late summer. Historically these pastures were rated in poor condition with the riparian areas trending downward. Riparian areas and springs in the eastern pastures continue to experience heavy use by cattle but remain within Forest standards and guidelines. In addition, grazing within the riparian areas could negatively impact elk calving and mule deer fawning habitat.

The Department supports monitoring riparian habitats through vegetation utilization, hydrologic and soil conditions. If any sign of downward trend in riparian habitat quality is observed grazing should be reevaluated.

The Alternative 3 identifies 5 springs in need of reconstruction or improvements and 4 new spring developments. These spring developments should be fenced and water provided off site. In addition, the Department recommends the new water developments be located so access is

available from open roads. The Department recommends fences around springs and fens be constructed of wood; reducing the negative impacts to birds. In addition, the Department recommends springs within the allotment be inventoried, monitored and fenced if needed.

A six year South Central mule deer study showed deer from the Fort Rock winter range migrate west towards Highway 97, thru the Antelope Allotment crossing numerous fences. Fences not meeting wildlife standards have been documented to cause mortality and injure deer. The Department recommends any fence construction or reconstruction be to wildlife standards; reducing the negative impact to mule deer, pronghorn and elk.

Jack Creek contains Miller Lake lamprey a sensitive species and Oregon spotted frog a Federal proposed species. In addition to riparian habitat lamprey and spotted frog populations should be monitored. If these populations show any sign of downward trend grazing should be reevaluated.

The hydrology report indicates 7 of 8 unfenced fens were in poor condition while 10 of 11 fenced fens were in good condition. To minimize impacts to fens and their unique and rare plant species the Department supports Alternative 3 recommendations to fence these sensitive habitats. Fens outside of fenced riparian areas should be prioritized for fences and fens within meadows scheduled for grazing should be fenced prior to cattle reintroduction. In addition, the Department recommends fenced areas include a buffer around fens. Soil and vegetation maps could be used to determine location and placement of fences within the wet meadows.

The Halfway and North Willow pastures are within the Fort Rock mule deer winter range. The Department has observed heavy bitterbrush utilization by cattle within these pastures. Utilization of bitterbrush by cattle reduces available forage for mule deer during fall migration and winter. Cumulative effects common to all alternatives identified in the Wildlife Report did not include prescribed fire. Numerous prescribed fires have been implemented within the eastern pastures and have substantially reduced the amount of bitterbrush available to wintering mule deer. The Department is concerned the earlier turn in dates in particular mid-May and increased duration of grazing in the Halfway pasture may increase bitterbrush utilization by cattle. The Department recommends monitoring bitterbrush utilization by cattle in these pastures and if needed grazing should be reevaluated.

The Chemult, North Sheep and Tobin pastures contain a known elk calving area. The EA applies two different elk calving dates one for the Winema and one for the Fremont. Cattle have been shown to influence the pattern of use by elk; elk avoid areas of cattle distribution. The Department's recommended elk calving dates are May 15 through June 30 and recommends it be applied consistently throughout the allotment.

The Department recommends cattle salt sights should be accessed from open roads were possible.

Aspen woodlands support a wide diversity of wildlife. The Department has observed increased aspen regeneration in the North Sheep pasture. Grazing within Jack Creek, the meadow units and

North Sheep pasture could negatively impact aspen stands and regeneration. Aspen utilization should be monitored and the aspen stands protected if needed.

Thank you for the opportunity to comment. Please free to contact me if you need additional information.

Sincerely,

Mary Jo Hedrick
Asst. District Wildlife Biologist

cc Craig Foster (ODFW)
Thomas Collom (ODFW)
Amy Markus (USFS)